

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 140

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of		
Biennial Determination of Avoided Cost)	MOTION FOR
Rates for Electric Utility Purchases from)	EXTENSION
Qualifying Facilities – 2014)	OF TIME

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission, by and through its Executive Director, Christopher J. Ayers, pursuant to North Carolina Utilities Commission (Commission) Rule R1-7, respectfully requests the Commission for an extension of time for filing initial comments, reply comments, and proposed orders on the avoided costs filings made by Duke Energy Carolinas, LLC (DEC), Duke Energy Progress, Inc. (DEP), and Dominion North Carolina Power (DNCP), (collectively, “the utilities”).

In support of this motion, the Public Staff shows the following:

1. By Order issued on January 8, 2015, the Commission directed the utilities to file their proposed avoided cost rates and standard form contracts no later than March 2, 2015, in accordance with the determinations and guidance set forth in the Commission’s December 31, 2014 Order in this Docket. In addition, the Commission established a procedural schedule for other parties to file initial comments no later than Monday, May 4, 2015; reply comments no later than Monday, June 8, 2015; and proposed orders no later than Monday, July 6, 2015.

2. The utilities filed their proposed avoided cost rates and standard form contracts on March 2, 2015.

3. The Public Staff began its investigation promptly following the investigation, served initial discovery on the utilities within two weeks of receiving the filings, and has conducted informational meetings with the utilities on their proposed changes to the avoided cost rates and standard form contracts. The Public Staff currently has discovery requests pending with each of the utilities.

4. The Public Staff will continue to diligently work on our investigation of the avoided cost filings, but due to the press of business, the retirement of senior counsel in this area, the unexpected death of one of the key engineers that works on these matters, and the extended absence for health-related reasons of one other key participant in the investigation, the Public Staff believes that the current timeline for comments will impose burdens on its staff and respectfully requests that the Commission extend the current deadlines as follows: for initial comments from May 4, 2015, to June 8, 2015; for reply comments from June 8, 2015, to July 13, 2015; and for proposed orders from July 6, 2015 to August 10, 2015.

5. The Public Staff has circulated this motion among the parties to this proceeding and is not aware of any opposition to the motion.

WHEREFORE, the Public Staff respectfully requests that the Commission issue an order:

1. Extending the deadline for filing initial comments from May 4, 2015, to June 8, 2015;
2. Extending the reply comment deadline from June 8, 2015, to July 13, 2015;
3. Extending the deadline for filing of proposed orders from July 6, 2015, to August 10, 2015; and
4. For such other and further relief as the Commission may deem just and proper.

This the 8th day of April, 2015.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

Antoinette R. Wike
Chief Counsel

Electronically submitted
/s/ Tim R. Dodge
Staff Attorney

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CERTIFICATE OF SERVICE

I certify that a copy of this Motion for an Extension of Time has been served on all parties of record or their attorneys, or both, by United States mail, first class or better; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This the 8th day of April, 2015.

Electronically submitted
/s/ Tim R. Dodge